

The respondent, F.E. Brody, is a currently licensed amateur (N1BBQ), a currently licensed UHF user (WPUV988), holder of a currently valid licensed radiotelephone Operators Permit. The respondent has also been a military avionics and airborne weapons systems (radio, radar, and airborne weapons telemetry), maintenance manager, and instructor. In addition to military and personal experience, the respondent had worked and consulted for a number of high tech US companies and foreign companies and governments in the computer and communications environs and industries.

===BEGIN RESPONDENT'S COMMENTS TO RM-10564 ===

I am opposed to the petitioner's request, in RM-10564, to ban business use on FRS frequencies.

Many small businesses have already found that the small-footprint and excellent in-building propagation on the assigned Family Radio Service UHF frequencies greatly enhances their business without unduly interfering with other personal users.

These small businesses do not need the longer range and increased complexity & cost of other frequency coordinated business bands. The ability to check stock, talk with employees at the loading door and parking lot at low cost and complexity greatly enhances the daily productivity at these small (many family owned) businesses. The business use I have seen, where FRS is a good fit, typically requires a usable range of no more than 200 meters.

FRS UHF frequencies are, in most areas of the US, not congested. The respondent resides in the area that comprises the Boston-NY megaplex. The entire NE megaplex area (to Washington, DC) encompasses almost 25% of the entire US population, and still has generally uncongested FRS UHF frequencies. Market forces alone should be left to determine which service best suits an individual business. If the business can tolerate the small-footprint (read: short range), frequency sharing, and relative lack of privacy, they should be able to continue to use the FRS as originally intended. If not, then they themselves will make the decision to move to a more complex and expensive service.

Additional concern:

With the exception of instances where other critical services are being disrupted, the FCC already lacks sufficient resources to enforce the current use of FRS. Adding yet another non-technical regulation will just result in increased expense to the commission (read: taxpayers). Regulations that are not being actively enforced merely create an atmosphere that encourages non-compliance amongst users.

===END RESPONDENT'S COMMENTS to RM-10564 ===